

1 residents. It is not as clean that we would like, where it
2 would be universal choice of carriers throughout the
3 country. In fact, we do allow in a competitive marketplace
4 people to enter the marketplace and leave the marketplace,
5 depending on where they consider the profit.

6 And here we run into the duty required by our TRS
7 regulations and federal law versus what is a reasonable
8 ingress and egress out of the competitive marketplace.
9 Suffice it to say, we're looking at equalizing the ability
10 of people who use TRS could you that use the regular public
11 switched-telephone network without the assistance of TRS.

12 MR. VARMA: I know that the chairman of the
13 Commission is very deeply concerned with this issue. The
14 chairman has expressed to us his concern of many kinds that
15 TRS users must have the same choices as others do, and I
16 agree with Dave's comments about the rules and the
17 responsibility that the carriers have. And I hope that we
18 can move forward on this issue and be able to level the
19 playing field.

20 But I have a question for you, based on what you
21 indicated earlier, that while I can understand that there is
22 a business case to be made by a long-distance carrier before
23 it would bring in Feature Group B connectivity to the TRS or
24 a B-1 or a BS-3 circuit depending on volumes and that would
25 there ever be instances where a carrier just does not have

1 enough volume of business to have direct connectivity to the
2 TRS center?

3 But is it not possible for the TRS operator under
4 those circumstances to be able to send the traffic back to
5 the local exchange carrier's access tandem, and the traffic
6 would be distributed from there to the long-distance
7 carrier, as it normally would be for a non-TRS user?

8 MR. BOSSI: Burt Bossi, AT&T. Good question. A
9 little bit of confusion here. We're not looking for
10 connectivity from these alternate carriers into the TRS
11 center. We're lodge looking for connectivity, Feature Group
12 D-type connectivity to the LEC access tandem, because that's
13 how we handle carrier-of-choice calls today.

14 We simply use MF in-band signaling to drop all of
15 the information up to the access tandem, in hopes that that
16 alternative carrier is there waiting to intercept. In my
17 cases they don't want to bring that Feature Group D-type
18 trunk into that access tandem. So there is no connectivity
19 to our center. We handle off the COC traffic just as you
20 illustrated.

21 MR. VARMA: So you do not transfer calls to a
22 long-distance carrier's point of preference?

23 MR. BOSSI: Which is typically the access tandem
24 where we're at.

25 MR. VARMA: Okay.

1 MR. WARD: Dave Ward of the Network Systems
2 Division. The question should be directed at a local
3 exchange carrier that is providing the 711 service
4 throughout the state.

5 The issue would be the design of the network to
6 accommodate what is known in the long-distance business as
7 "back haul," where a certain switch hubbing is preferred so
8 that it's cheaper to aggregate and transport. And in this
9 instance it may not be cheaper, but the same back-haul
10 principle would apply, where a path would be created by the
11 711 local exchange carrier for interconnecting long-distance
12 carriers that don't have a point of presence in the same
13 access tandem as the TRS center with the customers that they
14 normally serve in the area where the call is originated.

15 MR. VARMA: Okay. Thank you.

16 MS. NANKIN: Kurt, did you have a question?

17 MR. SCHROEDER: Yes. Thank you. One thing that
18 we've heard a lot about is outreach, which I think was one
19 of the first issues that I was introduced to in the TRS area
20 when I started working on it about a year ago. And I see it
21 being very important in the carrier-of-choice area and in
22 getting the word out on 711 and so on.

23 And I gather, we would all be happier, I guess, if
24 more states would follow the lead of Maryland and actually
25 devote a portion of their budget for relay to outreach. I

1 guess my question -- I won't direct this at anyone in
2 particular, but is there a way we can encourage more states
3 to do that? And then, as, I guess, a supplemental or
4 additional effort, is there is there a way that we can help
5 coordinate through some sort of national campaign the
6 states' efforts so that there will be the maximum effect
7 from both.

8 MS. STRAUSS: Let me read to you what the FCC's
9 current rule is. As a lawyer, I like to change rules, but
10 the current order directs carriers to conduct outreach
11 through the following means -- publication in the
12 directories, periodic billing inserts, placement of TRS
13 instructions in telephone directories, and TTY directories
14 as well, and directory assistance services.

15 Now, if you look at those means, you can gather
16 very quickly that that is not going to research the public.
17 Billing inserts can be effective, and I'm glad that they
18 were effective in Maryland. I was one listed. My name was
19 listed in a billing insert when I served on a consumer panel
20 for C&P. Not a single person in the entire Maryland,
21 Virginia, and District area called me to say, hey, I saw
22 your name. I think the vast majority of the public throws
23 out billing inserts. Anybody that doesn't know about relay
24 services is not going to look in their telephone books to
25 read about it.

1 So I guess my answer is that what you have on the
2 books right now is not I can't tell, and one way of changing
3 this is to change the rule and to indicate in the rule that
4 this is a new requirement, that outreach and education has
5 to be comprehensive, taking into account the various
6 recommendations made here and the comments that we will be
7 submitting subsequent to this proceeding will list several
8 additional ways.

9 Obviously, Maryland has served as a wonderful
10 example, and there are a plethora of means that can be
11 instituted on a national basis state by state, you be it's
12 not going to happen, I think, unless it's actually required.

13 Again, I reiterate, the offer by the NECA
14 representatives who didn't yell at me when I said it, so I'm
15 going to say it again, that they obviously made an offer to
16 try to coordinate a national campaign on relay, so I think
17 that's the answer to your question. If that offer holds, I
18 say go for it.

19 MR. SCHROEDER: Thank you. Anyone else?

20 MR. BECKER: Gil Becker.

21 MR. SCHROEDER: Yes, Gil.

22 MR. BECKER: I think it's all important for the
23 entire package that you do need to increase the scope of
24 what you are requiring for outreach. National outreach is
25 very important. I just want to applaud Bell Atlantic once

1 again because they provide full-page advertisements in each
2 of their telephone directories publicizing Maryland Relay
3 and 711 access.

4 MS. NANKIN: Okay. I think we should move on to
5 the third topic, which is 711 access to commercial mobile
6 radio services. Does anyone have any questions or comments
7 or views on this topic?

8 MR. VARMA: I have a question. I think Paul
9 mentioned in the morning today that the CMRS providers have
10 challenges in implementing 711 which are similar to those
11 that the wireless carriers face.

12 I was wondering if there are any CMRS providers
13 currently providing 711 services and what their plans are as
14 being able to provide 711 down the road as the wireless
15 industry moves forward in that direction. I think you had
16 attached one of these issues in the morning. If you are
17 able to answer it, I would appreciate an answer or anyone
18 else from the audience.

19 MR. LUDWICK: This is Paul Ludwick with Sprint,
20 and I think I can answer part, and I'll refer the rest of
21 the question. I believe that there are CMRS carriers
22 operating within the State of Maryland that offer 711, and I
23 know that Sprint PCCS, our cellular branch, is currently
24 doing an analysis on cost and every time required for a
25 nationwide 711 implementation. As to the number of CMRS

1 carriers that have offered the service, I don't have a lot
2 of advice I believe the to that. So, Gil, do you have any
3 information?

4 MR. BECKER: Unfortunately, I don't. We contacted
5 cellular providers and asked them. We didn't do anything
6 formal. We were waiting for a final ruling from the FCC and
7 didn't have any enforcement capability, so it wasn't one of
8 our priorities.

9 MR. LUDWICK: If I could just add, I think there
10 are a lot of enforcement implementations in 711. A lot of
11 the companies are trying to stay lean so that they can
12 maximize shareholder benefit, and until there is some type
13 of mandate I think you will find major efforts slow.

14 MR. VARMA: So are you saying that the CMRS
15 providers are of the view that they are not required to
16 provide 711 at the present time and that they are waiting
17 for another mandate from the Commission?

18 MR. LUDWICK: Sir, I think I can say that about
19 all the carriers, not just CMRS.

20 MR. VARMA: Okay.

21 MS. NANKIN: Does anyone else have any questions
22 or comments? Marty Liebman?

23 MR. LIEBMAN: Just a followup to Yog's question.
24 TRS carriers that are implementing or contemplating 711, are
25 there any impediments, technical or otherwise, that you are

1 facing in addition to the ones that Paul mentioned earlier?

2 MR. LUDWICK: I'm only aware of the ones that I
3 mentioned. I'm sure there probably are other conversations,
4 but I have not had any in-depth discussions could you
5 providers.

6 MR. LIEBMAN: And is there anything that wireless
7 carriers might want or need from the Commission in order to
8 assist them in implementing 711?

9 MR. LUDWICK: This is Paul Ludwick with Sprint,
10 and that's kind of a loaded question, because I think the
11 answer to that is a mandate and determining how cost
12 recovery is performed.

13 MS. NANKIN: Okay. Thank you. Anyone else on
14 this issue? We have Pam Stewart in the back, if you would
15 like to speak.

16 MS. STEWART: Pam Stewart from Maryland Relay. I
17 just want to confirm that. I've called a number of the
18 cellular and another that hasn't come up as much are the
19 small payphone companies, and told them that we have 711 in
20 Maryland, and would you please.

21 Basically, what they say is not until it's
22 required. It is not a requirement. And some of them have
23 even said, we set things up one way, and then the FCC
24 changes the rules with the mandate, then we have to switch
25 what we've done. So a lot of them are not going to do

1 anything until there is a mandate.

2 MS. NANKIN: Okay. Thank you. Anyone else?
3 Sunny?

4 SUNNY: This is Sunny speaking again. I just
5 wanted to make it clear that we're talking about
6 presubscription. We talked about presubscription for a
7 while, and I wanted you to be aware that there are two
8 presubscription -- we talked about single and double.

9 When Bill talked about presubscription he was
10 talking about the did you believe presubscription. Do you
11 understand what I'm talking about here? Do you understand
12 what I mean? Okay.

13 As a telephone user, I let my LEC know of my COC.
14 Then when I use the relay service I will have to tell the
15 relay service provider again what my COC is. If I don't,
16 then they will have their own long-distance service invoked.
17 So it has to be done twice. That's what's happening today.

18 MS. NANKIN: Dave?

19 MR. WARD: Yes. This is Dave Ward again. That's
20 correct, and the reason for that is the signaling
21 information that contains the identity of your long-distance
22 carrier of choice that's imbedded in the local exchange
23 carrier's record is not transferred automatically to the TRS
24 center.

25 And the reason for that is the clarification of

1 their FCC rules between a TRS center, which is more akin to
2 an information service and the common carrier, which is a
3 common carrier under our regulations. Common carriers are
4 not permitted to transmit common-carrier signaling
5 information to noncommon carriers at this moment. That is
6 one of the things we're revisiting, one of the issues we are
7 revisited in this next series of TRS proceedings.

8 MS. NANKIN: Okay. Thank you. We are now going
9 to open up -- oh, I'm sorry. One more question on carrier
10 of choice from Jamal Mazrui.

11 MR. MAZRUI: This is Jamal Mazrui, Network Systems
12 Division. I wanted to visit the customer-branding issue to
13 understand it better. I understand in Maryland now under
14 711 that is not being done. Rather, the CA answers by voice
15 and then determines what mode the user wants for the call.

16 First, would somebody explain exactly how that
17 process works, when someone calls? How does that
18 interaction occur, and are there any things that could be
19 done to make it more efficient, for example, certain
20 conventions that might be used to quickly indicate what kind
21 of a call? And then, on the subject of making it more
22 automatic, what can be technically done? It just seems like
23 we're going back a bit to have to go to the manual approach.

24 MS. NANKIN: Is there someone that would like to
25 address this issue, question? Burt?

1 MR. BOSSI: Burt Bossi, AT&T. I could speak about
2 the automatic approach, because that's the approach that
3 AT&T has been about for many years. We don't believe we're
4 taking a step backwards.

5 The front-end automation has worked well for our
6 data users. After the data users were invoked we added it
7 to the voice users, and they very much appreciated it
8 because it looks, acts, and feels much like any other
9 menu-driven system that they have encountered, so it is very
10 easy for them to take on. There is no outreach necessary
11 for that at all.

12 But for this new 711, as we collect these
13 customers of all different types, to answer your question
14 specifically, we will have -- this is plan of record -- this
15 isn't what's in place yet -- the plan of record is we will
16 answer with a relay prompt, very quick, two-second, press 1
17 for relay, that will differentiate all of the voice customers
18 away from the data customers. Okay?

19 If the voice customers press 1, they get
20 subsequent prompts much like our upfront automation works
21 now, where they could press different prompts to go directly
22 to a CA, to enter a forward number, to get the instructions
23 on what is relay because this is if first time they are
24 returning a call. It saves CA time. It saves cost. Okay?

25 If they don't press a digit, then we simply go and

1 seek for an ASCII tone, and then we try to synchronize with
2 Baudot and turbo code. And if all of the those things fail,
3 we end up back at a CA.

4 MS. NANKIN: Okay. Sure, Paul. Go ahead.

5 MR. LUDWICK: This is Paul Ludwick with Sprint.
6 And I wanted to follow up on what Burt said, simply because
7 I haven't really had a good opportunity as yet. But there
8 is pending rulemaking that governs speed of answer, when and
9 how it's measured, and I think that has a big impact on what
10 Burt is doing, and also what we are currently working with
11 the State of New York to implement, and that is a VRU front
12 end for 711 calls.

13 If calls are measured from the point at which they
14 reach the network, then based on the rules which have
15 previously been made by the Commission, all of the relay
16 providers will have a very, very difficult time of making
17 their average speed-of-answers requirements, and the
18 likelihood of going forward with an automated system that
19 front ends these calls is small, simply because you would
20 not be able to meet your target after handling 50 percent of
21 your calls which start off with four seconds for the message
22 and for the call referral.

23 So I just wanted to bring that to your attention
24 so that we were combining all these elements that ultimately
25 have an effect on 711.

1 MS. NANKIN: Thank you. Pam, did you want to say
2 something?

3 MS. GREGORY: Hi. This is Pam Gregory from the
4 Disabilities Issues Task Force, and I wanted to bring up an
5 issue that all of us know about but hasn't really been
6 discussed, and that's how 711 will affect the proposed
7 requirement for speech-to-speech relay.

8 I received -- Helene and I received an e-mail this
9 morning from the speech-to-speech user community saying,
10 just a reminder to the forum, don't forget about us. We're
11 interested in TRS, and we also want to know, and we want to
12 be part of 711 implementation. So I need to bring that to
13 the table. Paul, would you like to respond?

14 MR. LUDWICK: Yes. I'm sorry to have so much to
15 say, but this is the part I prepared for. One of the things
16 we want to keep is 711 does not lend itself very well to
17 differing user groups. We have four to five different user
18 gropes within TRS, major groups. You've got the
19 speech-to-speech group, TTY users, voice users, and we also
20 have language users.

21 I wouldn't expect we'll go video over 711 just
22 yet. But that being said, you have no way of distinguishing
23 which of those user groups you're servicing on any given
24 call, and all relay agents do not process all calls.

25 Obviously, not all of our relay agents can speak

1 Spanish, so that's handled by a special group of agents in a
2 particular relay center. So I don't know that we're
3 providing maximum benefit to the customers who are the end
4 users of relay by suggesting that 711 is the ultimate access
5 for relay because for that group it is answered initially by
6 an English-speaking agent and then has to be transferred to
7 a Spanish-speaking agent, we haven't provided them benefit.
8 In fact, we've done them a disservice on that particular
9 call.

10 So I think it's the same with speech-to-speech.
11 If you answer a call and an agent is not trained to process
12 those calls, you have a hard time at first without being
13 disrespectful of getting the information of getting the
14 information and making the transfer, which ultimately
15 extends the call. So this is just something to keep in
16 mind.

17 MS. NANKIN: Brenda?

18 MS. BATTAT: This directly relates to what
19 happened here in Maryland with VCO users, and I can tell you
20 we were extremely upset about it because everybody was very
21 excited that 711 was coming to Maryland. The VCO, we
22 publicized it, we talked about it to our members, and then
23 we found out that none of the VCO users could use it.

24 And I guess one of the things that I have concern
25 about is that the state can look at the statistics and say,

1 okay, VCO users, 4 percent of the users, we're not going to
2 give them access to 711. I really have a problem with that.
3 I really have a major problem with that.

4 And one of the reasons that the percentage is low
5 is because we are not reaching the people. We are not
6 marketing to them. We don't understand their uses. I just
7 find this extremely disturbing that the decision was made
8 based on the statistic of 4 percent. Okay. We'll just
9 leave them out this time around. And I called to find out
10 when we would be included, and I was told we don't have any
11 plans to include.

12 I really want to stress that when people are
13 starting to set up 711 in their state, that decisions cannot
14 be made like that to leave out what potentially is,
15 potentially is, if people can eventually get to them, the
16 biggest user group. I'm talking probably a conservative
17 estimate of about seven million people out there who are
18 potential users, VCO users. We have to reach them. But by
19 not giving them access to 711, I'm telling you, is not a way
20 to reach them.

21 I'm, you know, very upset about this. I just want
22 to make sure, because also, when Paul was talking he didn't
23 even mention VCO users. They get left out. And VCO users,
24 when I'm talking about access to VCO users I'm talking about
25 being they want to come in as a voice user. They do not

1 want to have to type.

2 Many of them have VCO phones, and to use the VCO
3 phone, you know, to type in is just a lot more complicated
4 anyway. So when you're talking VCO user, we're talking
5 about them accessing at a voice user, but they want to be
6 able to have text coming back to them.

7 Please do not forget this group. We are going to
8 be really causing a big stink if you do.

9 THE COURT: Pam, would you like to respond?

10 MS. STEWART: This is Pam Stewart with Maryland
11 Relay. Brenda, I'm just trying to figure out what you're
12 talking about. You mean that your branding as a VCO user
13 isn't there, not that you can't use it, because all the
14 person has to do is say "VCO," and they will be able to use
15 VCO on the 711.

16 MS. BATTAT: No, no. You cannot. As a VCO user I
17 have to type in.

18 MS. STEWART: No, you don't. I've done it. You
19 just say "VCO, please," and the operator has the key right
20 there. I'll come work with you one day.

21 MS. BATTAT: Well, I have not reached an operator
22 yet who has been able to switch me over to VCO. I cannot be
23 branded on 711. I have been told that many times.

24 MS. STEWART: You cannot be branded on 711.

25 MS. BATTAT: Which means that I have to come in on

1 the TTY.

2 MS. STEWART: No, no, it doesn't. I'd like to
3 come and work with you on it because I do it myself.

4 MS. BATTAT: Nobody has been able to switch me as
5 a voice caller. I've tried it several times. I've tried it
6 almost monthly to see if there's been any change.

7 MS. STEWART: Okay. I would love to come down and
8 work with you on that and see, because if that's so, then
9 we've got something we have to work out because you should
10 just be able to say "VCO, please" and switch you. So I
11 would love to come down and work with you.

12 MS. BATTAT: Right now I haven't been able to.

13 MS. STEWART: Great. Can I come down and work
14 with you, then? Okay.

15 MS. NANKIN: Thank you. Bill, would you like to
16 say something?

17 MR. McCLELLAND: Yes. Bill McClelland with MCI
18 WorldCom. To answer something that Jamal brought up and
19 something that Brenda brought up about being able to access
20 the system, there is one thing we haven't discussed and that
21 all the relay providers here are dependent upon, and that's
22 customer-furnished equipment.

23 If there were changes in the technology on the
24 customer-premise side that would give some type of out-of-
25 band signaling or out-of-voice-range signaling to the relay

1 provider, we could key on that very easily and go in that
2 way. That changes the whole aspect. But that's CPE
3 equipment that has to be changed. It's a longer term thing,
4 but it's a much more elegant solution.

5 MS. NANKIN: Thank you. I'm sorry. I think we're
6 going to have to move on to the next issues, topics, that
7 were discussed in the second session, and these topics were
8 Maryland experience and other states' experience with
9 implementing 711 in their states. Also, education and
10 technical assistance to the public about 711 access to TRS,
11 the length of time to implement a 711 system, and whether to
12 transfer the administration of N11 codes at the local level
13 from the incumbent plat to NANPA.

14 Does anyone have any questions or views or
15 comments on any of these four topics? I'm going to open it
16 up to everyone.

17 (No response.)

18 MS. NANKIN: Dave, do you want to make your
19 comment about the last question?

20 MR. WARD: Yeah. It just made me think of
21 something that the gentleman from MCI said with the in-band
22 or out-of-band within the same call codes generated by a
23 CPE. That would be the principle used by a cellular
24 telephone to access 711 or an abbreviated-dialing route, and
25 the principle would be the same.

1 The other thing I wanted to mention was something
2 that was brought up before by Paul Ludwick and Brenda Battat
3 on service quality, and perhaps the service-quality issue
4 for equalizing what a non-TRS user and a TRS user gain from
5 the network is not necessarily expressed in terms of the
6 number of seconds it takes for a CA to answer the line or,
7 for that matter, for anyone else to answer the line. Maybe
8 the qualitative equality is something entirely different,
9 and maybe that difference is in the utility of the network
10 and not necessarily the time it takes for the network to
11 provide the service.

12 I'm just throwing that out. We don't have any
13 basis to change the regulation here and now, but that's
14 something that we may consider in the future, and a robust
15 record on your opinions on measuring TRS service like we
16 used to measure local-exchange service may not be the way.

17 MS. NANKIN: Okay. Well, I would like to thank
18 our panelists for their excellent presentations and the FCC
19 staff for their insightful questions and comments and to
20 thank all of you for coming to the forum.

21 I would also like to let you know that the
22 transcript will be available on the FCC Web site within 10
23 working days and also to thank those people that are
24 watching on the Internet and that have provided us with
25 questions and their comments, and their questions and

1 comments will be part of the record.

2 I would also like to thank Commissioner Ness, Tom
3 Power, and Yog Varma for their remarks. And just to state a
4 couple of words, I think we've had a very stimulating and
5 informative discussion.

6 I would encourage all of you to submit ex partes
7 to the Commission. For those of you who do not know what
8 these are, they are simply your comments or views on the
9 issues discussed today at the forum. In order for them to
10 be ex parte comments and become part of the record, please
11 label them ex parte comments and place the CC Docket Number
12 92-105 on the document.

13 Please also send them to the secretary's office
14 and provide copies to Kurt Schroeder, myself, and Dave Ward.
15 The full directions for how to submit ex parte comments are
16 contained in the public notice announcing the public forum,
17 which is contained in the handouts.

18 Again, I just want to thank you all for coming,
19 and I thank you.

20 (Whereupon, at 4:30 p.m., the forum was
21 concluded.)

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23 //

24 //

25 //

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Heritage Reporting Corporation
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Washington, D.C. 20005

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